

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE PARETEUM SECURITIES LITIGATION

Case No. 1:19-cv-09767-AKH-GWG

STIPULATION AND [PROPOSED] ORDER

Lead Plaintiff the Pareteum Shareholder Investor Group (“PSIG”), Defendants Pareteum Corporation (“Pareteum”), Robert Turner (“Turner”), Victor Bozzo (“Bozzo”), Edward O’Donnell (“O’Donnell”), Denis McCarthy (“McCarthy”), Rob Mumby (“Mumby”), Robert Lippert (“Lippert”), Yves van Sante (“van Sante”), Luis Jimenez-Tunon (“Jimenez-Tunon”), Dawson James Securities Inc. (“Dawson James”), and Squar Milner LLP (“Squar Milner”), and Plaintiff William Baxley (“Plaintiff Baxley”),¹ by and through their undersigned counsel, hereby jointly stipulate as follows:

WHEREAS, on January 10, 2020, the Court granted the PSIG’s motion to consolidate three related putative securities class actions into the above-captioned action (the “Action”), and appointed the PSIG as Lead Plaintiff and undersigned counsel as Lead Counsel for the putative class (the “Consolidation Order”);

WHEREAS, on March 2, 2020, in the related action *William Baxley, et al. v. Pareteum Corporation, et al.*, No. 20-cv-03738 (the “Baxley Action”), Plaintiff Baxley filed an Unopposed Motion to Transfer Venue (the “Transfer Motion”) requesting that the United States District Court

¹ Defendants Pareteum, Turner, McCarthy, Bozzo, O’Donnell, Mumby, Lippert, and van Sante, and Jimenez-Tunon may be collectively referred to herein as the “Pareteum Defendants,” and, together with Dawson James and Squar Milner, may be collectively referred to herein as “Defendants.” Defendants, Lead Plaintiff, and Plaintiff Baxley may be collectively referred to herein as the “Parties.”

for the Northern District of Alabama transfer the Baxley Action “to the Southern District of New York for ultimate consolidation” with this Action;

WHEREAS, on April 30, 2020, the United States District Court for the Northern District of Alabama granted the Transfer Motion, finding that “[t]ransfer of the action to the Southern District of New York where, presumably, it will be consolidated with [this Action], will create efficiencies likely to benefit all parties, as well as witnesses”;

WHEREAS, on May 14, 2020, the Baxley Action was transferred into the United States District Court for the Southern District of New York and referred to Your Honor “as possibly related to” this Action;

WHEREAS, on May 21, 2020, the PSIG filed a Notice of Related Case informing the Court that PSIG believed the Baxley Action was related to, and therefore should be consolidated with, this Action;

WHEREAS, the PSIG and Alabama counsel for Plaintiff Baxley subsequently conferred and agreed that the Baxley Action should be consolidated with and into this Action pursuant to the Consolidation Order;

WHEREAS, on June 23, 2020, the Court held a status conference during which the PSIG advised the Court that Plaintiff Baxley did not oppose consolidation of the Baxley Action with this Action, and the Court requested that the PSIG submit a joint stipulation and proposed order to that effect;

IT IS HEREBY STIPULATED AND AGREED, by and among undersigned counsel for the Parties, that:

1. Pursuant to the Consolidation Order, the Baxley Action is hereby consolidated with and into this Action for all purposes under the leadership of Lead Plaintiff and Class Counsel.

STIPULATED AND AGREED BY:

KAHN SWICK & FOTI, LLC

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Counsel for Defendant Squar Milner LLP

ORDER

The above stipulation having been considered, and good cause appearing therefore, **IT IS
SO ORDERED.**

Signed this _____ day of _____, 2020.

HONORABLE ALVIN K. HELLERSTEIN
UNITED STATES DISTRICT JUDGE